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Waking America to the Importance of Sleep®

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June 1, 2009

Ms. Carol Rowan
BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics
Room 4080
2 Massachusetts Avenue, NE
Washington, DC 20212

Dear Ms. Rowan:

On behalf of the National Sleep Foundation, we have reviewed the Bureau of Labor Statistics proposed changes to the Annual Time Use Survey (ATUS) instrument, specifically the inclusion of the National Institute on Aging's health and wellness measures. We have reviewed the proposed module, with particular interest in the questions as they relate to tiredness, and find the questions to be appropriate. Moreover, we are encouraged by the use of this data and hope that its contrast with the established ATUS data may prove a rich resource for future researchers.

We would also like to take this opportunity to ask for your help. As you are probably aware, sleep times are closely studied by researchers from various scientific disciplines. In addition, the sleep medicine field produces direct measurement of sleep times for individuals under very rigorous scientific criterion. Individual sleep times and aggregate sleep times are highly consistent with the findings of well-known sleep surveys, like the National Sleep Foundation's own *Sleep in America* poll, as well as similar surveys from the Centers for Disease Control and Prevention and researchers at universities across the United States.

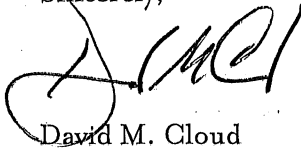
However, these data are not consistent with the ATUS sleep times. Even though BLS clearly states the ATUS time use data limitations, some members of the media have challenged the findings of some sleep research when it is contrasted to the time use findings. The National Sleep Foundation believes the ATUS data significantly and consistently overstates sleep times. We believe this to be true in each of your traditional age cohorts, but it is particularly acute in the youngest cohorts wherein the ATUS data deviates by more than one hour.

Carol Rowan

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After reviewing the instrument and methodology, the National Sleep Foundation believes some of the discrepancy may be attributable to definitions (i.e., sleep versus 'time in bed'), but we are not confident that this completely addresses the problem. NSF has great respect for the dedicated professionals who developed and manage ATUS, and we recognize the complexity of the undertaking, so we are reluctant to suggest changes without a more detailed review. We would therefore ask BLS to undertake a systematic review of the ATUS sleep times data incongruity issue. The National Sleep Foundation is eager to help BLS in any way possible.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Cloud", written over the printed name.

David M. Cloud